

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
)
Plaintiff,)
)
)
) Civil Action No. 04-351E
)
2003 HONDA PILOT)
VIN# 2HKYF18563H600150,)
)
Defendant.)

STIPULATION TO STAY

The United States of America and Khang Nguyen, by and through their respective counsel, and with the intent to be legally bound hereby, stipulate and agree as follows:

1. This civil forfeiture action is related to an on-going state criminal proceeding involving Khang Nguyen.
2. In order to protect the ongoing criminal case, and the rights of Khang Nguyen against self incrimination, this civil forfeiture action shall be stayed until further order of court.
3. The United States will notify the Court upon the conclusion of the related criminal investigation. All of the respective rights of the parties are preserved during the stay period.
4. The Clerk shall mark this case administratively closed.
5. This Stipulation is subject to the approval of the Court.

With the intent to be legally bound hereby, the undersigned execute this Stipulation this
____ day of _____, 2006.

Mary Beth Buchanan
United States Attorney

By:

Mary McKeen Houghton
Assistant U.S. Attorney
Suite 4000, U.S. Courthouse
700 Grant Street
Pittsburgh, PA 15219
(412) 894-7370
PA ID# 31929

Gary E. Gerson, Esquire
Attorney for Khang Nuguyen